

1 THE HONORABLE JOHN H. CHUN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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9 FEDERAL TRADE COMMISSION, *et al.*,

10 Plaintiffs,

11 v.

12 AMAZON.COM, INC., a corporation,

13 Defendant.

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15 CASE NO.: 2:23-cv-01495-JHC

16 STIPULATED MOTION AND
17 [PROPOSED] ORDER TO SEAL
18 PORTIONS OF THE SECOND
19 AMENDED COMPLAINT

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21 NOTE ON MOTION CALENDAR:
22 October 31, 2024

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24 The parties, by and through their attorneys of record, respectfully request that the Court
enter the proposed order set forth below, sealing portions of Plaintiffs' Second Amended
Complaint.

In support of this request, the parties represent the following to the Court:

1. On September 30, 2024, the Court issued an Order on Defendant's Motion to Dismiss & Plaintiffs' Motion to Bifurcate (Dkt. #289), which granted Plaintiffs until October 31, 2024, leave to file a Second Amended Complaint as to any claims dismissed without prejudice.

1 2. Pursuant to that Order, Plaintiffs are filing a Second Amended Complaint that
2 amends claims under the state laws of Maryland, Pennsylvania, and New Jersey.
3 The only substantive changes to the Second Amended Complaint relate to these
4 state law claims.

5 3. The Court previously entered three orders sealing portions of the Complaint.
6 Dkts. #108, 120, 172.

7 4. The Second Amended Complaint includes information the Court previously
8 ordered to be sealed. Dkts. #108, 120, 172. That information is highlighted in the
9 Second Amended Complaint.

10 5. Plaintiffs are filing a public version of the Second Amended Complaint redacting
11 only the information the Court previously ordered to be sealed. Dkts. #108, 120,
12 172.

13 6. Pursuant to Local Civil Rule 5(g)(3)(A), the undersigned counsel certify that they
14 met and conferred to reach the agreement described in this Stipulated Motion. The
15 following attorneys conferred by email on October 29, 2024 and October 31,
16 2024: Edward Takashima, Kara King, and Michael Baker for the FTC; Michael Jo
17 for the State of New York; Tim Smith for the State of Oregon; Rahul Darwar and
18 Victoria Field for the State of Connecticut; and Kristen DeWilde, Katherine
19 Trefz, Robert Keeling, Katharine Mitchell-Tombras, Molly Terwilliger, and CJ
20 Pruski for Amazon.

21 7. The parties stipulate as follows, subject to Court approval, and jointly request that
22 the Court enter the following Order approving this Stipulation:

23 a. The highlighted portions of the Second Amended Complaint shall be
24 sealed.

1 Stipulated to and respectfully submitted this 31st day of October, 2024, by:

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[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this ____ day of _____, 2024.

JOHN H. CHUN
UNITED STATES DISTRICT JUDGE

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